

**BellSouth Telecommunications, Inc.**

**Report on the BellSouth Bulk  
Migration and Regional Tests**

**December 22, 2003**

**BellSouth Telecommunications, Inc.**  
**Bulk Migration Process and Regional Tests**

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**Report of Independent Accountants**

PricewaterhouseCoopers LLP  
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To Management of BellSouth Telecommunications, Inc.:

We have examined management's assertion, included in the accompanying *Management Assertions on BellSouth Telecommunications' Bulk Migration Process*, that BellSouth Telecommunication, Inc. (BellSouth) utilized the BellSouth Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Process (Bulk Migration Process Document) to complete its test of Bulk Migration service requests for three central offices in Florida. The test of the Bulk Migration Process was initiated on October 30, 2003 and completed on December 11, 2003. Management is responsible for the Company's assertion. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting management's assertion and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

Our examination identified certain instances where BellSouth deviated from the Bulk Migration Process criteria defined in the accompanying *Management Assertions on BellSouth Telecommunications' Bulk Migration Process* and all are outlined in Attachment A.

In our opinion, except for the deviations from the criteria described in Attachment A, BellSouth utilized the Bulk Migration Process, in all material respects, to complete its test of Bulk Migration Service Requests for three central offices in Florida that was initiated on October 30, 2003 and completed on December 11, 2003, based on the criteria defined in the accompanying *Management Assertions on BellSouth Telecommunications' Bulk Migration Process*.

This report is intended solely for the information and use of BellSouth Corporation and BellSouth Telecommunications, Inc. and appropriate regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and distribution is not limited.

*PricewaterhouseCoopers LLP*

PricewaterhouseCoopers LLP  
December 18, 2003

Attachment A

**Exceptions to Management Assertions on  
BellSouth Telecommunications' Bulk Migration Process**

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue:

1. While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.
3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.
4. While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
6. While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.
7. The BellSouth Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Process document states that UNE-L 2 wire unbundled copper loop-non designed and Remote Call Forwarding services can be submitted as Bulk Orders. However, BellSouth's electronic ordering systems will reject UNE-L 2 wire unbundled copper loop-non designed (UCL-ND) and Remote Call Forwarding services that would be included on Bulk Migration orders.
8. While observing the process for the completion of bulk migration orders, we noted that EnDI emails were not being received by the CLEC for 49 non-coordinated lines. We noted that 47 of the lines were

cutover on December 2, 2003 and two of the lines were cutover on December 11, 2003. The EnDI emails provide notification to the CLECs that the cutover has been completed.





**Management Assertions on BellSouth  
Telecommunications' Bulk Migration Process**

Management of BellSouth Telecommunications (BellSouth) asserts that:

BellSouth's Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) Process (Bulk Migration Process) will enable the bulk migration of Competitive Local Exchange Carrier (CLEC) customers. BellSouth's Bulk Migration Process Version 1 is published at <http://interconnection.bellsouth.com/> dated March 26, 2003. BellSouth has utilized its Bulk Migration Process to complete a test of Bulk Migration service requests for three central offices in Florida from October 30, 2003 through December 11, 2003, with the exception of those items presented in Attachment B. During the test, BellSouth submitted test local service requests as a simulated CLEC, and processed the service requests through the provisioning process, however BellSouth did not send NPAC messages. The BellSouth Bulk Migration Test has been defined in Sections V and VI of this report.

The following describes the term "utilized" criteria:

**Bulk Process Migration Test**

BellSouth Management asserts that Management utilized the Bulk Migration Process during their test of the Bulk Migration service requests. As it relates to this assertion, "utilized" will be assessed according to the following:

- BellSouth processed the service requests as per the Bulk Migration Submission/Flow Process included in the Bulk Migration Process.
- BellSouth completed all edit and validation checks on the service requests that are included in the Bulk Migration Process.
- BellSouth was able to convert all test lines by the due dates, up to 125 lines per day per central office, and reestablished dial tone on the CLEC CFA Block.
- BellSouth assigned local service request due dates according to the intervals defined by the Bulk Migration Process.
- BellSouth processed only those services (i.e., USOCs) that are included in the Bulk Migration Process.

A handwritten signature in cursive script that reads "William N. Stacy".

William N. Stacy  
Network Vice President  
Interconnection Services

Attachment B

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue:

1. While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.
3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.
4. While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
6. While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.
7. The BellSouth Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Process document states that UNE-L 2 wire unbundled copper loop-non designed and Remote Call Forwarding services can be submitted as Bulk Orders. However, BellSouth's electronic ordering systems will reject UNE-L 2 wire unbundled copper loop-non designed (UCL-ND) and Remote Call Forwarding services that would be included on Bulk Migration orders.
8. While observing the process for the completion of bulk migration orders, we noted that EnDI emails were not being received by the CLEC for 49 non-coordinated lines. We noted that 47 of the lines were cutover on December 2, 2003 and two of the lines were cutover on December 11, 2003. The EnDI emails provide notification to the CLECs that the cutover has been completed.





**Report of Independent Accountants**

PricewaterhouseCoopers LLP  
10 Tenth Street, Suite 1400  
Atlanta GA 30309-3851  
Telephone (678) 419 1000  
Facsimile (678) 419 1239

To Management of BellSouth Telecommunications, Inc.:

We have examined management's assertion, included in the accompanying *Management Assertions on BellSouth Telecommunications' Hot Cut Process*, that the Hot Cut Process, as it relates to the physical Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration, used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process used for non-bulk hot cuts in BellSouth's region, as of December 18, 2003. Management is responsible for the Company's assertion. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting management's assertion and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

We noted that sufficient Hot Cut order volume did not exist within Alabama and Kentucky; accordingly, we could not perform any testing over the Hot Cut Process in those states.

Our examination identified certain instances where BellSouth Field or Central Office Technicians deviated from the Hot Cut Process defined in the accompanying *Management Assertions on BellSouth Telecommunications' Hot Cut Process* and all are outlined in Attachment C.

In our opinion, except for the deviations from the criteria described in Attachment C, the Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process, in all material respects, as the process used for non-bulk hot cuts in BellSouth's region, as of December 18, 2003, based on the criteria set forth in the accompanying *Management Assertions on BellSouth Telecommunications' Hot Cut Process*.

This report is intended solely for the information and use of BellSouth Corporation and BellSouth Telecommunications, Inc. and appropriate regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and distribution is not limited.

*PricewaterhouseCoopers LLP*

PricewaterhouseCoopers LLP  
December 18, 2003



Attachment C

**Exceptions to Management Assertions on  
BellSouth Telecommunications' Hot Cut Process**

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue:

1. While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.
3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.
4. While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
6. While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.
7. While observing Hot Cuts across BellSouth's region, we noted that the central office technician did not perform a pre-cut dial tone and ANAC test for the BellSouth and CLEC lines prior to performing the hot cut for seven telephone numbers. We noted that the central office technician did not perform a pre-cut dial tone and ANAC test on the CLEC line prior to performing the hot cut for two additional telephone numbers. We also noted that the BellSouth Technician completed each cutover and successfully verified CLEC dial tone and completed an ANAC test.
8. While observing Hot Cuts across BellSouth's region test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone for one line prior to the cutover. The Central Office

Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

9. While observing Hot Cuts across BellSouth's region, we noted that a cutover was completed despite a service order in a Missed Appointment status. Due to the service order being in a Missed Appointment status, an EnDI fax was not sent to the CWINS center.





**Management Assertions on BellSouth  
Telecommunications' Hot Cut Process**

Management of BellSouth Telecommunications (BellSouth) asserts that:

The Bulk Migration Process requires central office and field technicians to physically perform the Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration (the Hot Cut Process). The Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same Process used for non-bulk hot cuts in BellSouth's region, as of December 18, 2003, with the exception of those items noted in Attachment D, based on the criteria below. A description of BellSouth's test of its Bulk Migration Process has been included in Sections V and VI of this report.

The following describes the terms "same" and "Hot Cut Process" criteria:

**Hot Cut Process**

As it relates to this assertion, "same" is defined as:

The Hot Cut Process for non-bulk hot cuts will be considered the same as the Hot Cut Process used during the Bulk Migration Process Test if each of the steps defined as the "Hot Cut Process" below for Central and Field Office Hot Cuts are completed for each process. As it relates to this assertion, the "Hot Cut Process" will be defined as the following processes:

*Central Office Hot Cuts*

1. **Order Receipt** – Central Office (CO) Technicians receive hot cut information associated with service orders via Work Force Administrator-Dispatch In (WFADI) and Switch/FOMS.
2. **Install Jumpers** – The CO technician will install jumpers according to the Switch/FOMS instructions.
3. **Pre-cut Dial Tone and ANAC Testing** – CO technician will test for dial tone and ANAC on the existing BellSouth pair and on the CFA block.
4. **Cutover** – The CO technician performs the cutover according to the Switch/FOMS assignment instructions on the Due Date. Coordinated conversions, as ordered by CLECs, will be performed when advised by the CWINS. Non-coordinated conversions, as ordered by CLECs, will be performed anytime on the Due Date.
5. **Post-Cut Dial Tone Test** – For coordinated cuts, the CO Technician tests the cutover on the BellSouth Cable Pair to ensure that dial tone has been restored and the proper phone number is received.
6. **CLEC Notification**
  - a. For Non-Coordinated Hot Cuts, the CO technician completes the WFA-DI work-step, which will also send a completion to Switch/FOMS. Also, the Enhanced Delivery Initiative system (EnDI) system sends a fax or email to the CLEC and a fax to the CWINS center as notification that the Hot Cut is complete.
  - b. For Coordinated Hot Cuts, the CO technician advises the CWINS that the cut is complete.



*Field Office Hot Cuts*

1. **Order Receipt** – Field Office (FO) receives hot cut orders via LMOS/IDS (non-design) or WFA-DO/IDS (dispatch out, design), and CO Technicians receive hot cut order information via WFA-DI and Switch/FOMS.
2. **CO Install Jumper** – The CO technician will install jumpers according to the Switch/FOMS instructions.
3. **CO Continuity Test** – The CO technician performs a continuity test to ensure that the jumper from the F1 Block to the CLEC CFA Block has continuity.
4. **CO Completion** – The CO technician completes the WFA-DI work-step, which will also send a completion to Switch/FOMS.
5. **Field Wiring** – The CO technician will install jumpers according to the LMOS or WFA-DO instructions.
6. **Pre Conversion/Migration Dial Tone & ANAC Test**
  - a. **BellSouth Dial Tone - Non-Coordinated & Coordinated** - Field Technician will verify dial tone and ANAC to verify results match disconnect order.
  - b. **CLEC Dial Tone**
    1. **Non-Coordinated** - On Due Date, Field Technician checks for CLEC dial tone on universal and copper lines.
    2. **Coordinated SL1 or SL2** - On Due Date, for universal and copper lines the Field Technician checks for CLEC dial tone, ANACs, and provide Telephone Number to CWINS to verify accuracy.
7. **Field Cutover** – The FO technician performs the cutover of the customer line.
8. **Post-Cut Dial Tone Test** – For coordinated cuts, the FO Technician will test the cutover to ensure that dial tone has been restored and the proper phone number is received.
9. **CLEC Notification**
  - a. For Non-Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO/IDS or LMOS/IDS system. Also, EnDI sends a fax or email to the CLEC and a fax to the CWINS center as notification as the Hot Cut is complete.
  - b. For Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO or LMOS systems and advises the CWINS that the cut is complete.

*William N. Stacy*

William N. Stacy  
Network Vice President  
Interconnection Services

Attachment D

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue:

1. While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.
3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.
4. While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
6. While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.
7. While observing Hot Cuts across BellSouth's region, we noted that the central office technician did not perform a pre-cut dial tone and ANAC test for the BellSouth and CLEC lines prior to performing the hot cut for seven telephone numbers. We noted that the central office technician did not perform a pre-cut dial tone and ANAC test on the CLEC line prior to performing the hot cut for two additional telephone numbers. We also noted that the BellSouth Technician completed each cutover and successfully verified CLEC dial tone and completed an ANAC test.
8. While observing Hot Cuts across BellSouth's region test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone for one line prior to the cutover. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.



9. While observing Hot Cuts across BellSouth's region, we noted that a cutover was completed despite a service order in a Missed Appointment status. Due to the service order being in a Missed Appointment status, an EnDI fax was not sent to the CWINS center.



Supplementary Information

## **SECTION V – EXECUTIVE OVERVIEW**

### **A. Overview of Reports**

In recognition that the Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration Process (Bulk Migration Process Document) may be used by a CLEC to migrate existing multiple non-complex UNE-P services to a UNE-L offering, BellSouth has completed a test of Bulk Migration service requests for three central offices in Florida. The management of BellSouth requested that PricewaterhouseCoopers LLP (PricewaterhouseCoopers) perform an independent examination surrounding BellSouth's assertion that:

- BellSouth has utilized the Bulk Migration Process during their test of the Bulk Migration service requests for three central offices in Florida; and that,
- The Hot Cut Process, as it relates to the physical Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration, used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process used for non-bulk hot cuts in BellSouth's region.

The management of BellSouth has provided herein a description of the Bulk Migration Test completed in Florida and the Regional Test, as well as the criteria for the assertions noted above. BellSouth Management is responsible for identification of the criteria underlying its assertion of utilizing the Bulk Migration Process Document and the sameness of the Hot Cut Process across its region.

### **B. Objective of Supplementary Test Information**

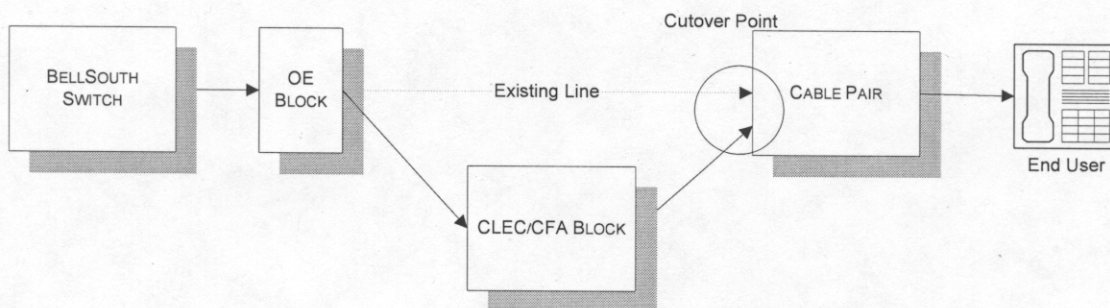
The objective of this information is to provide a description of the Bulk Migration Test that was completed in Florida from October 30, 2003 through December 11, 2003, and the Regional Test that ended on December 18, 2003.

## SECTION VI – BULK MIGRATION AND REGIONAL TESTS

To demonstrate the effectiveness of the Bulk Migration Process, BellSouth conducted a test for three central offices in Florida. For the BellSouth Bulk Migration Florida Test, (the Test), BellSouth simulated an operational CLEC, (Pseudo CLEC) which submitted multiple Bulk Migration Orders. The Test was completed following the guidelines outlined by the Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration Process (Bulk Migration Process Document). BellSouth completed the following during the Test:

- BellSouth established a UNE-P Test Bed in three Central Offices in Florida. Florida is expected to be the first state to have a CLEC exercise the Bulk Migration Process. UNE-P telephone numbers (TNs) were established based on the make-up of outside plant facilities within the state, with approximately 50% on copper, 14% on Universal Digital Loop Carrier (UDLC), and 36% on Integrated Digital Loop Carrier (IDLC). Additionally, approximately 85% of the TNs were established as residential class of service, while 10% were business and 3% were coin. The remaining 2% were spread between business and residence classes of service for remote call forwarding solutions.
- The Pseudo CLEC created and submitted 724 Bulk Migration service orders. The submission process included interaction with a BellSouth Project Manager to assign due dates, submission of LSRs through BellSouth's electronic ordering gateways, (i.e., TAG, LENS and EDI), and interaction with the BellSouth CWINS during the provisioning of the service orders.
- Service requests submitted by the Pseudo CLEC were processed through BellSouth's systems and service centers as normal transactions.
- During a typical copper or universal CLEC Hot Cut, the CLEC will deliver dial tone from its own switch to a collocation point in a BellSouth Central Office. The CLEC collocation points are hard wired to a CLEC Block on the BellSouth Distributing Frame in the central office. Due to BellSouth operating as a Pseudo CLEC, BellSouth had to deliver dial tone from its own switch to its Pseudo CLEC Block on the Distributing Frame. This was accomplished by wiring the BellSouth OE Block to the Pseudo CLEC Block on the Distributing Frame for universal and copper services. Refer to Figure 1.0 for a diagram for the generation of Pseudo CLEC dial tone.

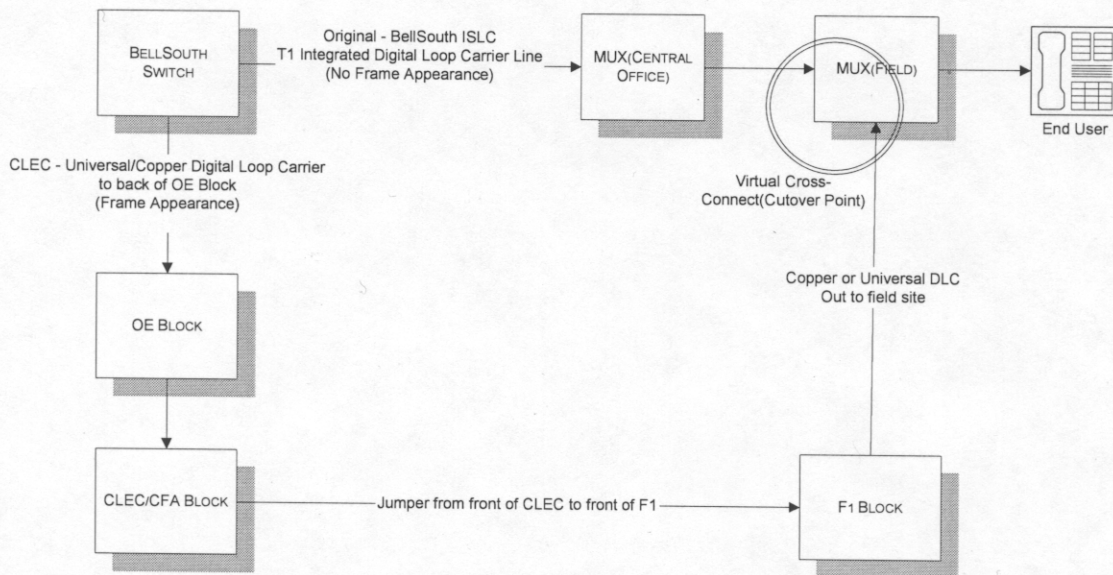
Figure 1.0





- During a typical Integrated CLEC Hot Cut, the CLEC will deliver dial tone from its own switch to a collocation point in a BellSouth Central Office. The CLEC collocation points are hard wired to a CLEC Block on the BellSouth Distributing Frame in the central office. Due to BellSouth operating as a Pseudo CLEC, BellSouth had to deliver dial tone from its own switch to its Pseudo CLEC Block on the Distributing Frame. Refer to Figure 1.1 for a diagram for the generation of Pseudo CLEC dial tone. IDLC facilities have no physical appearance on the BellSouth frame. BellSouth established a second set of TNs that were wired to an OE block on the BellSouth frame then to the CLEC CFA block to simulate dial tone for the CLEC switch.

Figure 1.1



- The Test was completed for a total of 758 lines, which include 724 lines processed in accordance to the Bulk Migration Process and 34 lines processed as single orders for Remote Call Forwarding (RCF) and 2 Wire Unbundled Copper Loop-Non Design (UCL-ND). RCF and UCL-ND migrations were initially submitted as Bulk Migration orders, however they were rejected by the electronic ordering systems.
- The central offices included in the Test were West Hollywood, Arch Creek and Perrine.
- The Test did not include the sending of NPAC messages, since the lines in the test were to remain with BellSouth. The Test also did not include a billing verification for those charges that were incurred by the Pseudo CLEC.

To demonstrate that the Hot Cut Process as it relates to the physical Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element (UNE-L) migration, used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process used for non-bulk hot cuts in BellSouth's region, BellSouth completed the following:

- BellSouth has instituted the same work instructions for central office and field technicians for Hot Cuts throughout its region.
- The Hot Cut process utilized by the Bulk Migration Process is the same process utilized by BellSouth for each hot cut provisioned throughout the BellSouth region. Hot Cuts are subject to the same provisioning steps to be completed regardless of their status as a bulk/non-bulk order.



**SECTION VII - GLOSSARY**

AICPA	American Institute of Certified Public Accountants
ANAC	Automatic Number Announcing Circuit
BOPI	Bulk Order Package Identifier
CFA	CLEC Facility Assignment
CLEC	Competitive Local Exchange Carrier
CO	Central Office
CWINS	Customer Wholesale Interconnection Network Services Center
DOE	Direct Order Entry
EATN	Existing Account Telephone Number
EDI	Electronic Data Interchange
EnDI	Enhanced Delivery Initiative
EXACT	Exchange Access Carrier Tracking
FO	Field Office
FOC	Firm Order Confirmation
IDL	Integrated Digital Loop Carrier
IDS	Integrated Dispatch System
LAUTO	LNP Service Order Generator
LCSC	Local Carrier Service Center
LENS	Local Exchange Navigation System
LMOS	Loop Management Operations System
LNP Gateway	Local Number Portability Gateway
LOTT	Local Order Testing Tube
LSR	Local Service Request
MA	Missed Appointment
MUX	Multiplexer
NPAC	Number Portability Administration Center

PM	Project Management
PON	Purchase Order Number
SOCS	Service Order Communication System
SUPS	Supplemental
SWITCH/FOMS	Frame Operations Management System
TAG	Telecommunication Access Gateway
TN	Telephone Number
UDLC	Universal Digital Loop Carrier
UNE	Unbundled Network Element
UNE-L	Unbundled Network Element-Loop
UNE-P	Unbundled Network Element-Port
USOC	Universal Service Order Code
WFA	Work Force Administrator
WFA-C	Work Force Administrator – Corporate
WFA-DI	Work Force Administrator – Dispatch In
WFA-DO	Work Force Administrator – Dispatch Out